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FEDERAL COMMUNICATIONS COMMISSION OFFICE OF SECRETARY

December 19, 1996

Office of the Secretary Federal Communications Commission 1919 M Street, N.W., Washington, D.C. 20554

CC DOCKET NO. 96-45

Re: In the Matter of Universal Service.

Dear Secretary and Commissioners:

United Cerebral Palsy Associations (UCPA) submits an additional response in this matter in response to the Recommended Decision of the Federal-State Joint Board on Universal Service CC Docket No. 97-45 (released November 8, 1996) (Recommended Decision) in re: Section 254.

A hardcopy and a disk version is enclosed.

Please contact me directly if there is a comment or concern.

Sincerely,

Jenifer Simpson

Technology Policy Associate, Government Activities

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BEFORE THE FEDERAL COMMUNICATIONS COMMISSION WASHINGTON, D.C.

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OFFICE OF SECRETARY

In the Matter of)	OF SECRETAR
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Federal-State Joint Board on)	CC Docket No. 96-45
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Universal Service)	

COMMENTS OF UNITED CEREBRAL PALSY ASSOCIATIONS

in response to the Recommended Decision of the Federal-State Joint Board on Universal Service CC Docket No. 97-45 (released November 8, 1996) (Recommended Decision) in re: Section 254

December 19, 1996

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TABLE OF CONTENTS

I.	INTRODUCTION	2
II.	UCPA DISAGREES WITH JOINT BOARD'S DECISION TO OMIT PERSONS WITH DISABILITIES IN ITS PROPOSALS	2
III.	Cost of Adapting Phones is High for those With Cerebral Palsy	3
	Current Universal Services Fund Does Not Pay for this Equipment	4
	Nothing in Section 255 requires Funding of SCPE	
IV.	NEED FOR EQUALITY AND FAIRNESS IS FUNDAMEN IN PRINCIPLES OF UNIVERSAL SERVICE Only 28% of Persons With Speech Disability Can	
	Use Voice Telephony	6
	(TRS) Among those with Speech Disabilities	6
	Voice Telephony	7
V.	SPECIFICALLY INCLUDE CHILDREN WITH DISABILITY IN UNIVERSAL SUPPORT MECHANISMS THAT SUPPOSCHOOLS AND LIBRARIES	ORT
	Schools Currently Do Not Cover the SCPE Needed by Children With Disabilities	8
	Information Technology for Children With Disabilities	9
VI.	OTHER COMMENTS SUPPORT INCLUSION OF PERSO DISABILITIES WHO ARE LOW INCOME	
VI.	CONCLUSION	12

Reply Comments of United Cerebral Palsy Associations To Recommended Decision on the Joint Board Page -1-

I. INTRODUCTION

United Cerebral Palsy Associations (UCPA) submits these comments in response to the Recommended Decision of the Federal-State Joint Board on Universal Service, CC Docket No. 97-45 (released November 8, 1996) (Recommended Decision).

United Cerebral Palsy Associations (UCPA) is a national nonprofit membership association of 153 affiliates in 43 states that delivers in excess of \$500 million of services annually to individuals with disabilities, including many persons with cerebral palsy and similar developmental disabilities. Significantly, two-thirds of individuals with cerebral palsy experience speech disabilities, typically with little or no clear speech. UCPA affiliates are very familiar with the difficulties encountered by persons with speech disabilities as they attempt to utilize existing voice-based telephony, an integral service within Universal Service.

UCPA believes that the Federal Communications Commission (FCC) must continue to take a leadership role in establishing principles in all its rulemakings to ensure that the access needs of persons with disabilities are addressed responsibly by public and private entities charged with delivering the nation's critical telecommunications information delivery system.

UCPA's mission is to advance the independence, productivity and full citizenship of people with disabilities. Furthermore, UCPA believes that disability is a natural manifestation of the human condition: to this end, we expect all federal agencies to take responsibility for ensuring disability issues are addressed as a priority in their endeavors and to not assume that other entities, private or public, focus on the needs of this community.

II. UCPA DISAGREES WITH JOINT BOARD'S DECISION TO OMIT PERSONS WITH DISABILITIES IN ITS PROPOSALS

While the Recommended Decision of the Joint Board recognizes the intent of the 105th Congress to ensure that individuals with disabilities have access to telecommunications services it has however rejected proposals to assist in implementing such intent and "recommend [s] that the Commission not adopt specific principles related to telecommunications users with disabilities in this universal service proceeding". [Paragraph 24 of Overview].

Apparently the Board bases its recommendation not to adopt specific universal service principles related to telecommunications users with disabilities largely on an assumption that another section of the new Telecommunications Act, i.e., Section 255, addresses sufficiently relevant disability access issues.

The Board states no need to address disability matters under this Section 254 docket because "they will be addressed in a separate proceeding to implement section 255." [Recommended Decision at 392].

The Board refers also to interstate telecommunications relay services as providing a means by which individuals with hearing or speech disabilities can communicate by telephone, and suggests these services are already funded through universal service mechanisms.

In asserting these points, the Board apparently is suggesting that the requirements of Section 255 and interstate relay services will be enough to achieve universal service for individuals with disabilities.

UCPA believes that the Board has failed to address, in its reasoning, the issues of the high cost of adaptive and assisted devices for persons with disabilities, lack of use of the relay services system by persons with speech disability, and the limited ability of other agencies and entities to ensure disability access in their endeavors.

UCPA therefore urges the Joint Board to reconsider its principles more broadly and to include the community of persons with disabilities into their proposals for addressing universal service.

III. CURRENT UNIVERSAL SUPPORT MECHANISMS DO NOT ADEQUATELY FUND SPECIALIZED CUSTOMER PREMISES EQUIPMENT

UCPA notes that the Joint Board recommends that service to the initial primary residence connection be fully supported by universal service support mechanisms. [Recommended Decision at 4]. However, UCPA reminds the Board that basic access to voice telephony and other wireline service from the primary residence is often at a very high cost to persons with disabilities.

Cost of Adapting Phones is High for those With Cerebral Palsy

For instance, findings from a recent survey by UCPA indicate average expenditure of

\$551.00 to adapt their telephones by a group of persons with cerebral palsy and similar severe physical disability.¹ The survey addressed the telecommunication needs of 100 persons (68 adults and 32 children) with cerebral palsy and similar severe physical disability.

One-third of survey respondents indicated they had to buy extra equipment to make the basic phone device work for them. These items included external speakers, phone guards to permit dialling, headsets, and switching devices among some of the solutions listed. [Please see our Graphic in Appendix A which shows "How much spent to make the phone work for persons with speech and motor disabilities".]

Current Universal Services Fund Does Not Pay for this Equipment

When asked how they paid for such equipment respondents reported the following means, in order of source:

Out of Pocket

Medicaid

Vocational Rehabilitation

Other Public (e.g., Mental Retardation-Developmental Disability Agencies, Tech Act programs)

Other Private (donations, UCP affiliates)

Local Education Authority

Employer

Please see our graphic in Appendix B "How Persons With Speech Disability Usually Pay for Equipment" that shows the extent of out-of-pocket and public funding of technology used by persons with severe disabilities.

UCPA notes that persons with other disabilities, such as they who are deaf, hard-of-hearing and late-deafened, in addition to those with vision disabilities and blindness also report spending hundreds and sometimes thousands of dollars needed to purchase such equipment to break through the communications barriers presented by current 'universal service' devices and services.

The work to develop this survey and the resulting findings were executed via subcontract with Gallaudet University, by United Cerebral Palsy Associations, Inc., Washington DC, as part of a larger research project funded by the U.S. Department of Education, National Institute on Disability and Rehabilitation Research: in support of Grant No. H133E50002, entitled "Universal Telecommunications Access."

Although there are a few states do distribute SCPE to consumers with disabilities, the limited funding in most states restricts both the groups of persons with disabilities eligible to receive such equipment and the type of equipment distributed. In particular, persons with speech and motor disabilities, which often include persons with cerebral palsy, are rarely the beneficiaries of such equipment distribution programs, most likely due to lack of knowledge of the needs of this group by the public utility commissions or due to lack of leadership at the federal level.

UCPA notes that more than half of the states do not have any equipment distribution programs at all and that none of the respondents in our survey reported the equipment distribution program in their state as the source of payment for technology they use in telecommunication.

Additionally, the rejection of the proposal to use universal services funds by the Joint Board to facilitate and expand provision of special needs equipment for people with disabilities is very troubling to UCPA as it fails to address the reality that persons with disabilities are among the poorest in the nation [see our Comment on Page 2 of our Reply Comments of May 3, 1996].

Nothing in Section 255 requires Funding of SCPE

UCPA also notes that although Section 255 does require access to telecommunications devices and services, nothing in that section requires the establishment of Specialized Consumer Premises Equipment (SCPE) distribution programs, or the development of funding sources for that purpose and there is nothing in this Section which addresses the income issues of persons with disabilities and the corresponding issue of the cost of equipment to access universal service to make it accessible to and usable by the average persons with a disability.

UCPA, who is a member of the U.S. Architectural and Transportation Barriers Compliance Board ("The Access Board"), charged with developing guidelines for equipment access under Section 255, notes that the Access Board has created a Telecommunications Access Advisory Committee (TAAC) for the purposes of addressing the design, development and fabrication of equipment and services to meet the needs of persons with disabilities. As the Federal Communications Commission (FCC) is no doubt aware, the TAAC is currently finalizing its recommendations for the equipment guidelines.

UCPA notes that there is nothing in those pending guidelines that addresses a federal requirement for equipment distribution programs or that addresses the costs of SCPE or the related income disparity issues within the disability community. As an active member

of the TAAC, UCPA assures the Joint Board that the discussions and debates about the guidelines focus on accessibility of generic telecommunications equipment -- both equipment within the network and customer premises equipment, and then only when it is readily achievable to do so by the manufacturer or provider of services. Furthermore, Sec. 255 imposes requirements only on manufacturers and not on the entities that regulate and govern the services, and associated costs, of telecommunication.

It is clear to UCPA that the need for specialized equipment will continue to exist, despite the requirements of Section 255. The Board errs in stating that Section 255 will in any way ensure that consumers who need SCPE will be sure to get such devices.

IV. NEED FOR EQUALITY AND FAIRNESS IS FUNDAMENTAL IN PRINCIPLES OF UNIVERSAL SERVICE

Only 28% of Persons With Speech Disability Can Use Voice Telephony

UCPA's survey of persons with speech disability who use AAC, as cited previously, asked if they were ever UNABLE to use the phone. 72 percent of the survey participants answered Yes to this question, indicating that two-thirds of the survey respondents have significant difficulty using the publicly switched voice-based telephone network. 28 percent of survey respondents answered NO to this question, indicating they perceived their ability to use the voice based telephone network as closer to average use (Please see Appendix C "Persons With Speech & Motor Disabilities Ability to Use Current Voice Telephony").

With more than two-thirds reporting inability to use the phone unless they have an AAC device it would seem that universal service is not universal for persons with speech disabilities and that there is a need to address this particular disability is a principle within universal service.

Lack of knowledge about Telephone Relay Service (TRS) Among those with Speech Disabilities The Board, in its recommendations, refers also to the interstate telecommunications relay services (TRS) as providing a means by which individuals with hearing or speech disabilities can communicate by telephone, and suggests these services are already funded through universal service mechanisms.

UCPA's survey of 100 persons with cerebral palsy and similar severe disabilities found that 63 percent **didn't know about Telephone Relay Services** as a service available to those with speech disabilities.

Reply Comments of United Cerebral Palsy Associations To Recommended Decision on the Joint Board Page -6Significant numbers of the adult respondents indicated they did not know how to make a relay services call (42 of 68 adults) with only 3 parents (of 32 children) indicating knowledge of how to make a TRS call. This is a significant lack of knowledge about the availability of this paracommunication network despite the mandate for a national Telephone Relay System (TRS) by Congress in the Americans With Disabilities Act (ADA) to address both hearing and speech disabilities.

Please see our two Graphics in Appendix D that address this lack of knowledge of relay service as a communication support for persons with speech disabilities: "Respondents Knowledge About Telephone Relay Services: Know or Don't Know" and "Comparison of Adults and Parents Knowing or Not Knowing How to Make a Relay Services Call".

Persons With Speech Disabilities Want to Use Voice Telephony

UCPA's survey found that our 100 respondents expressed a preference for using the voice telephony system, despite the physical difficulties they encounter. When asked to choose one way to communicate they clearly preferred the phone with 36 percent of the survey respondents selecting this mode for telecommunication. Please see our Graphic in Appendix E "What is Preferred by Persons with Speech Disabilities" which shows the preferences among Phone, EMAIL, TTD (or relay services), and Faxing.

While this may reflect lack of knowledge about TRS as noted above, or the fact that TTY devices are not particularly friendly to persons with speech disability who usually also have concomitant severe fine motor disabilities, and therefore prefer the least amount of key stroking, this group remarked that their preference for voice telephony was predicated on the ubiquitous nature of telephony. For example their comments includes statements such as 'I have one and not the others'; 'It's there'; 'I can get help with it'; 'Access and help'; 'I've been using it for years'; 'Only thing I have'; 'I can get across the message [as utilizes an Alternative & Augmentative Communication (AAC) device])

The Board's contention that the nation's TRS system takes care of the needs of persons with speech disabilities flies in the face of the realities. UCPA urges that universal service support mechanisms be available to persons with speech disabilities to ensure that users of Alternative & Augmentative Communication (AAC) devices pay no more for end user access to telecommunications services than is required by the general public. We note that calls by AAC users typically take at least twice as long due to the response period required by AAC device users; as a consequence telephone bills are surely larger.

UCPA read with interest the Commission's proposal to provide discounts at 20-90%, up to a cap of \$2.25 billion, for eligible schools and libraries (Paragraph 440 of Recommended Decision) and we therefore ask for a discount of the same rate for users of Alternative & Augmentative Communication devices due to the requirements of their calls which take longer. We also join

with the National Association of the Deaf in renewing a request to use universal service support mechanisms to both bring toll charges for TTY and relay users in line with other toll charges to support the longer-than-average calls made by AAC users.

UCPA again notes that the other programs and support mechanisms suggested by the Joint Board to resolve this issue -- most notably Section 255 and TRS -- will not provide the needed funding to create parity in toll charges for AAC users. Rather, a universal service principle ensuring such parity is needed to ensure universal long distance telephone service for TTY and AAC users.

V. SPECIFICALLY INCLUDE CHILDREN WITH DISABILITIES IN UNIVERSAL SUPPORT MECHANISMS THAT SUPPORT SCHOOLS AND LIBRARIES

The Joint Board has recommended extensive universal service support for telecommunications services in schools and libraries, as noted above, to a cap of \$2.25 billion. We remain disturbed that nowhere in the Recommended Decision does the Board acknowledge the need to ensure that these services provided through schools and libraries are accessible to children with disabilities. In its Notice of Proposed Rulemaking on universal service, the FCC noted the importance of providing telecommunications access to children:

"[e]xposure to telecommunications services for our nation's school children will provide them with skills needed for jobs in a technologically advanced society." --Notice of Proposed Rulemaking and Order Establishing Joint Board, FCC 96-93 (released Mar. 8, 1996) at 72.

UCPA concurs with many other disability groups, such as NAD and AFB in their comments, that for far too long, inaccessible technologies have prevented children with disabilities from receiving the full benefits of information available through new and advanced telecommunications services.

Students with disabilities face significant bureaucratic, attitudinal and financing barriers to accessing appropriate technology tools, settings and supports needed to reach their educational goals. Of critical concern to UCPA is that more than two-thirds of individuals with cerebral palsy have functional speech and motor limitations which directly impacts their participation and interaction in classrooms, social settings and in other arenas that typically developing children take for granted. In addition, there are thousands of other students with varying degrees of functional limitations in vision, hearing, speech, motor and cognitive abilities or for whom manipulation of information is difficult and for whom access to educational and assistive technology is paramount.

Schools Currently Do Not Cover the SCPE Needed by Children With Speech Disabilities

For instance, we draw your attention to our finding in our survey, as cited, to how little support for communication technology is provided by Local Education Authorities, who are responsible for the education of children with disabilities. Only 10 percent of the parents in our survey reported that the source of funding of AAC for their children with speech disabilities was the local education authority. Please see Appendix F, "Funding Sources for AAC for Children with Severe Disabilities" and the pie chart "How AAC Was Paid For by Children With Severe Disabilities" which shows who pays.

UCPA notes that while the special education law itself includes a regulation to address technology² our findings indicate poor service to children with severe disabilities in the matter of assistive technology, despite current federal educational policy.

Devolution to the States of Educational Technology Also Does Not Guarantee Access to Necessary Information Technology for Children With Disabilities

UCPA notes the devolution of power to state educational authorities in the Goals 2000 legislation and other current educational mandates to address education and technology. To this end we proposed to the Department of Education, in its development of the National Technology Plan in Education (Appendix G "UCPA Comments to U.S. Secretary of Education, Richard W. Riley, on the National Technology Plan in Education") three approaches to ensure the needs of children with disabilities are addressed by state education authorities:

- access and equity needs of students with disabilities for assistive and information technology must be given priority in the development of the national education plan for technology.
- access needs for disability applications must be built into the technology infrastructure at the onset of any system development at the local, district, regional and state levels.
- requirements, including incentives for school-to-work, training and private sector initiatives, must be imposed on local school districts for access to educational technology by students with disabilities, with similar requirements also imposed on all other providers of ancillary services to students as appropriate (e.g., subcontractors providing transportation, literacy, recreation or other services and

Regulation: Section 300.308 Assistive Technology. Each public agency shall ensure that assistive technology devices or assistive technology services, or both, as those terms are defined in 300.5-300.6, are made available to a child with a disability if required as a part of the child's -- (a) special education under 300.17; (b) related services under 300.16; or (c) supplementary aids and services under 300.550. [20 U.S.C. Sec. 1412(2), (5) (B).]

supports, or collaborations with the education system).

UCPA urges the Commission to incorporate these three approaches as a condition of universal service to schools via the discount mechanism. Without federal guidance, we believe it likely that only a few state education authorities will seriously take up disability access as they build up and out their electronic communciation information infrastructures. Absent such leadership by the FCC, we are not convinced, based on the experiences of our customers with cerebral palsy and similar severe sensory disabilities, that these needs will be addressed.

UCPA notes that it is common for one agency to assume that because there are other federal laws and other regulatory policies that address the needs of children with disabilities (e.g., the Individuals With Disabilities Education Act, the Technology Related Assistance for Persons with Disabilities Act, et al.) that the technology and communications needs for children with cerebral palsy and with severe sensory disabilities will be taken care of. However, none of these laws guarantee telecommunications access for students with cerebral palsy and similar severe disabilities despite the best efforts of UCPA to bring these needs to the attention of all executive agencies and to address these needs within their purview.

UCPA urges the FCC to ensure that where Federal support mechanisms are established for classrooms and libraries, such support should include provision for telecommunications services which are accessible to children with disabilities. We note that current universal service funds are derived from customer charges, customers which include children and adults with disabilities directly as subscribers and as members of such households.

VI. OTHERS SUPPORT INCLUSION OF PERSONS WITH DISABILITIES

UCPA notes that on April 12th, the Center for Civic Networking (CCN) and the Graduate School of Library and Information Science (GLIS) at the University of Illinois Champaigne/Urbana, in their comments to the FCC Joint Board on Universal Service, outlined a set of universal service recommendations and described data analyses that could support them. These commenters urged the Board to develop Universal Service policy that promotes a leveling effect between information haves and have-nots and asked the asked the Board to carefully examine results of analyses that illustrate the characteristics of affected population groups.

In particular they state they will submit a series of white papers on analyzing Census data on demographic groups such as "Home-based businesses and microenterprises; Discouraged workers; **Disabled individuals**; Family farms; Group households; and Single mothers on public assistance."

UCPA notes that data on 'disabled individuals' are targeted here. UCPA also reminds the Joint

Board of the low level of employment found among persons with disabilities.³ UCPA urges the Joint Board to consider carefully data generated by such groups and others who address income disparity that reflects income capacity to access universal service elements, such as persons with disabilities.

In their comments, CCN's Richard Civille, who is also founder of CapAccess, a community network in the National Capital area serving over 12,000, said:

"The Federal-State Joint Board on Universal Service has been tasked with a solemn responsibility. Its recommendations will influence decisions that will affect the new economy and individual quality of life in the United States for decades to come."

and co-commenter Professor Ann Bishop, a co-founder of Prairie-Net, a community network project serving over 15,000 in southern Illinois, said:

"We strongly urge the Board to seek out and examine data that will illuminate how their recommendations may impact economic opportunity and quality of life not only on disenfranchised groups, but on emerging economic sectors."

UCPA urges the Board to take up very seriously the proposals and framework addressed by this group as they clearly understand that disability-related issues are an integral part of universal service considerations.

Among the 237,000 with severe speech disability or "unable to have speech understood" 76 percent are unemployed. From "Americans with Disabilities 1991-92", by the "U.S. Department of Commerce Economics & Statistics Administration, Bureau of the Census report, 1993.

VII. CONCLUSION

Historically, people with speech disability are left out when disability is addressed. It is only recently that a new understanding of the scope of speech disability has been reached.⁴

Individuals with speech disabilities are often unable to use the present existing voice telephone networks because of the lack of accommodation made to speech disabilities and a lack of recognition of the problem. These individuals may, or may not, be benefitting from advanced or enhanced telecommunications equipment and services in order to search for or maintain employment, attend school, socialize or otherwise be included in general activities of human beings. Many believe there could be technical solutions that a digitally based telephony network

Total Number with a Functional Limitation in Speech, 2,284,000

Unable to have speech understood at all, 237,000

COMBINED TOTALS = 2.521,000

--From "Americans with Disabilities 1991-92", by the "U.S. Department of Commerce Economics & Statistics Administration, Bureau of the Census report, 1993.

And:

According to the U.S. Department of Education, National Institute on Disability & Rehabilitation Research (NIDRR), 2.5 million people have difficulty 'having their speech understood.' (DSA-1, January 1991).

According to the U.S. Census, 129,000 children (age 0-17), have cerebral palsy, of which 110,000 report this as their primary disability condition. About 634,000 children age 0-17 have "speech problems" according to the same U.S. Census report on disability, but severity of disability is not indicated.

Approximately 30 percent of persons with cerebral palsy have a severe speech disability, and 85 to 90 percent of all individuals with cerebral palsy have a speech disability of one kind or another. Approximately 500,000 persons in the U.S. have cerebral palsy: UCPA estimates that at least 150,000 persons with cerebral palsy need augmentative communication prostheses to have their voices understood at all.

Furthermore, the American Speech Language Hearing Association (ASHA) estimates that there are another 3 million persons who lose speech capacity each year, either permanently or temporarily, as a result of traumatic brain injury, stroke or other accident or injury.

Persons age 15-64 years old (working population age) with a functional limitation in "having speech understood" number 1,517,000.

Persons age 15-64 years old (working population age) with a functional limitation categorized as "UNABLE to have speech understood" number 161,000.

Persons age 65 years and older, with a functional limitation in "having speech understood" number 767,000.

Persons age 65 years and older, with a functional limitation categorized as "UNABLE to have speech understood" number 76,000.

could provide if the electronic intelligence built into current communication devices were considered and built into the design of the nation's telecommunications infrastructure. This would include ensuring that universal services principles address disability.

While telecommunications relay services provide a way to communicate for those with speech disability who are aware of the service, at most, TRS provides only indirect access to basic telephone services. Voice telephony itself is problematic for those with speech disabilities.

Section 254 of the Telecommunications Act provides a very specific mandate to the Commission to ensure that access to advanced telecommunications and information services is available to all Americans in schools, libraries, health care providers, and in all regions of the country. Section 254((b)(2) and (6). The Commission's implementation of this section will directly and profoundly impact the ability of these new services to reach Americans with disabilities.

Access to telecommunications services increasingly is becoming critical to expanding employment, economic, educational, and recreational opportunities for any person with a disability, and specifically for those with severe speech disability.

The Commission has adopted over the years several rules demonstrating its commitment to ensuring access to telecommunications services by individuals with disabilities but in this area of universal services principles it fails to address the realities presented by persons with speech disabilities and other disabilities.

Congress's intent to ensure telecommunications access by individuals with disabilities. Repeatedly, the need for ensuring disability access has been brought to the attention of the Commission by consumers and industry alike. Yet the Commissions response in virtually every one of these proceedings has been to reject the proposed disability safeguards, pending a Commission proceeding on Section 255. Even more perplexing is that in its recent Notice of Inquiry, the Commission questioned whether it will even initiate any rulemaking at all under Section 255. In the Matter of Implementation of Section 255 of the Telecommunications Act of 1996, Notice of Inquiry, WT Docket. No. 96-198 (Sept. 19, 1996) at 7.

UCPA urges the Commission to renew its commitment to ensuring access to telecommunications services for persons with cerebral palsy and similar severe disabilities in this and other proceedings to implement the new Telecommunications Act. Further, we urge the Commission to recognize that while Section 255 will require access to new telecommunications products and services, this section is limited in its scope; it will not resolve every issue concerning telecommunications access especially for persons with speech disabilities. Thus, there is a clear and convincing need to address telecommunications access by persons with disabilities should be addressed in the universal service docket and other Commission actions.

UCPA thanks the Commission for the opportunity to submit these comments, and welcomes the

opportunity to assist the Commission in securing comprehensive telecommunications access which includes the needs of persons with cerebral palsy and similar severe disabilities.

Sincerely,

Jenifer Simpson

Technology Policy Associate

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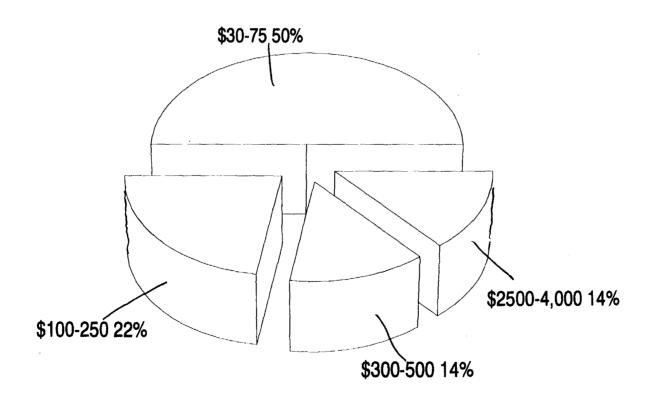
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December 19, 1996

APPENDIX A

HOW MUCH SPENT TO MAKE THE PHONE WORK FOR PERSONS WITH SPEECH AND MOTOR DISABILITIES

How Much Spent To Make Phone Work By Persons W/ Speech&Motor Disabilities

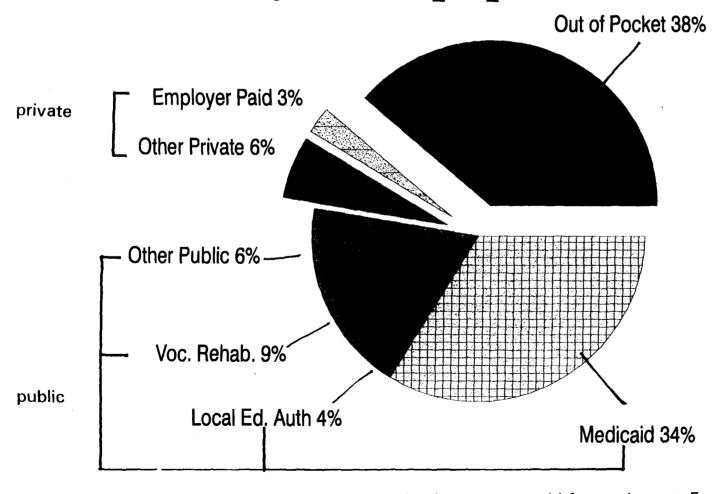


22 survey respondents reported a dollar figure on how much they spent to make the phone work for them. (N=31)

APPENDIX B

HOW PERSONS WITH SPEECH DISABILITY USUALLY PAY FOR EQUIPMENT

How Persons W/Speech Disability Usually Pay For Equipment

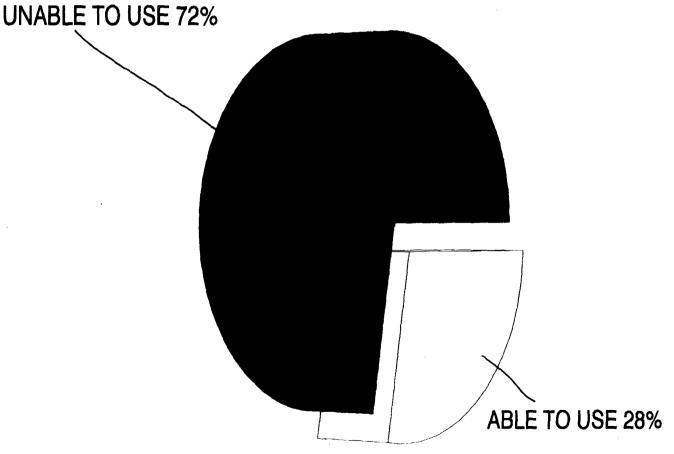


In several instances, combined resources paid for equipment E.g., Employer and Out-of-Pocket or Vocational Rehabilitation Agency and Out-of-Pocket. (N = 106).

APPENDIX C

PERSONS WITH SPEECH & MOTOR DISABILITIES ABILITY TO USE CURRENT VOICE TELEPHONY

Persons With Speech & Motor Disabilities Ability to Use Current Voice Telephony



All survey respondents answered this question (N = 100).

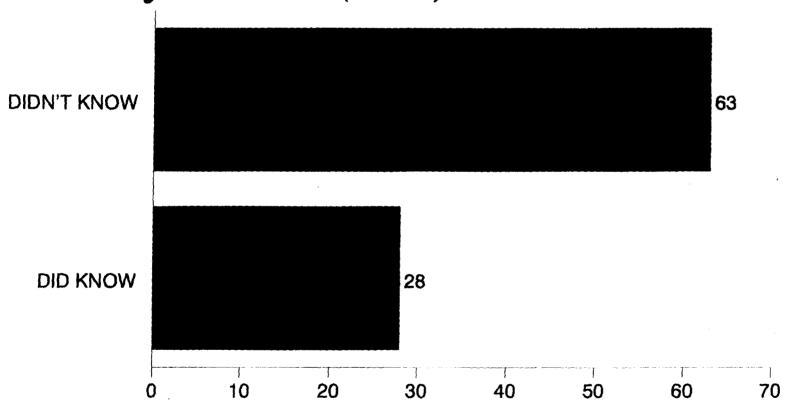
APPENDIX D

RESPONDENTS KNOWLEDGE ABOUT TELEPHONE RELAY SERVICES: KNOW OR DON'T KNOW

and

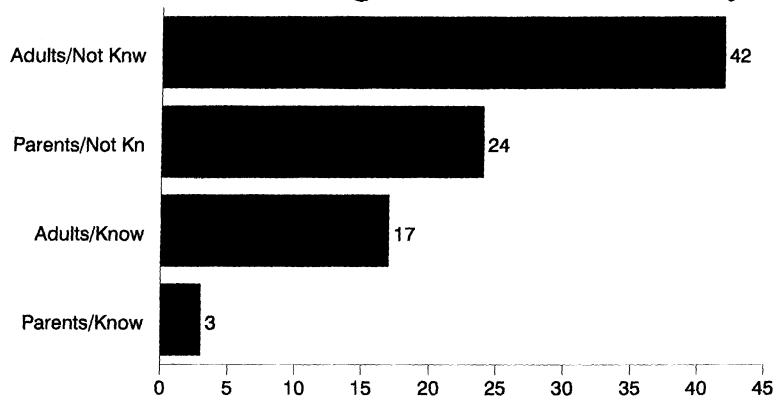
COMPARISON OF ADULTS AND PARENTS KNOWING OR NOT KNOWING HOW TO MAKE A RELAY SERVICES CALL

Respondents Knowledge About Telephone Relay Services (TRS): Know or Don't Know



Note that more than 91 survey respondents answered this question (N = 91)

Comparison of Adults & Parents Knowing or Not Knowing How To Make Relay Call



A majority of survey respondents answered this question (N =

96).